United States Bankruptcy Court Southern District of Texas

ENTERED

November 27, 2024 Nathan Ochsner, Clerk

THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	Case No. 22-33553
ALEXANDER E. JONES	§	(Chapter 7)
	§	
Debtor.	§	

STIPULATION AND AGREED ORDER EXTENDING THE DEADLINE FOR TRUSTEE TO OBJECT TO DEBTOR'S CLAIMED EXEMPTIONS

WHEREAS, on December 2, 2022 ("<u>Petition Date</u>"), Alexander E. Jones ("<u>Debtor</u>") filed his voluntary petition for relief under chapter 11 of the Bankruptcy Code.

WHEREAS, on June 14, 2024 ("<u>Conversion Date</u>"), the Court entered an *Order* [DE 708] converting the bankruptcy from a chapter 11 proceeding to a chapter 7 proceeding and Christopher R. Murray was duly appointed as the chapter 7 trustee ("<u>Trustee</u>") over the Debtor's bankruptcy estate ("<u>Estate</u>").

WHEREAS, on June 28, 2024, the Debtor filed his *Schedules A/B, C, D, E/F, G, H, I, J, and Summary of Assets and Liabilities* [DE 749] ("<u>Conversion Schedules</u>") along with his *Statement of Financial Affairs* [DE 750].

WHEREAS, on July 2, 2024, the 341 meeting of creditors was held and concluded.

WHEREAS, the deadline for parties to object to the exemptions claimed by the Debtor in the Conversion Schedules was August 1, 2024 ("**Original Objection Deadline**").

WHEREAS, by *Stipulation and Agreed Order* [DE 791], the Original Objection Deadline was extended for all parties to September 2, 2024.

WHEREAS, by *Stipulation and Agreed Order* [DE 833], the Original Objection Deadline was further extended for all parties to September 30, 2024 [DE 833].

WHEREAS, by *Stipulation and Agreed Order* [DE 866], the Original Objection Deadline was further extended for the Trustee to November 29, 2024.

WHEREAS, the Trustee requested, and the Debtor agrees to a further extension of the Original Objection Deadline for the Trustee to respond to the Debtor's claimed exemptions ("<u>Trustee's Objection Deadline</u>").

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

- 1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereafter.
- 2. The Trustee's Objection Deadline is extended to <u>January 13, 2025</u>.
- 3. This *Stipulation and Agreed Order* does not affect the deadline applicable for parties, other than the Trustee, including any creditors and/or parties-in-interest in this bankruptcy case ("Non-Trustee Parties"), to object to the exemptions claimed by the Debtor in his Conversion Schedules. Those deadline(s) for Non-Trustee Parties remains the same unless otherwise agreed upon by a separate agreement by and between any of the Non-Trustee Parties and the Debtor, or by Court order.
- 4. Nothing herein shall be construed to prohibit the Trustee, any of the Non-Trustee Parties, or the Debtor from seeking further extensions by agreement and/or by further order of the Court.
- 5. Notwithstanding anything in the Bankruptcy Code or the Bankruptcy Rules to the contrary, this *Stipulation and Agreed Order* shall be effective immediately upon the Court's approval.
- 6. The Court has exclusive jurisdiction and power regarding the implementation, interpretation, and enforcement of this *Stipulation and Agreed Order*.

United States Bankruptcy Judge

Dated: November 27, 2024

Signed: November 27, 2024

AGREED AS TO FORM AND SUBSTANCE ON NOVEMBER 27, 2024:

JONES MURRAY LLP	JORDAN & ORTIZ, P.C.
/s/ Jacqueline Q. Chiba	/s/ Shelby A. Jordan (with permission)
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CO-COUNSEL FOR THE CHAPTER 7 TRUSTEE	CO-COUNSEL FOR THE DEBTOR

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United States Bankruptcy Court Southern District of Texas

In re: Case No. 22-33553-cml

Alexander E. Jones Chapter 7

Official Committee Of Unsecured Creditor

Debtors

CERTIFICATE OF NOTICE

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The following symbols are used throughout this certificate:

Symbol **Definition**

- Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS
 - regulations require that automation-compatible mail display the correct ZIP.
- ##

Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.

Addresses marked '##' were identified by the USPS National Change of Address system as undeliverable. Notices will no longer be delivered by the USPS to these addresses; therefore, they have been bypassed. The debtor's attorney or pro se debtor was advised that the specified notice was

undeliverable.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 29, 2024:

Recip ID db	Recipient Name and Address Alexander E. Jones, c/o 2525 McKinnon Street, Suite 425, Dallas, TX 75201
aty	+ Anna Kordas, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036-1000, UNITED STATES 10036-6730
aty	+ Crowe & Dunlevy, 2525 McKinnon St, Suite 425, Dallas, TX 75201-1543
aty	+ David Franklin Hill, IV, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036-6730
aty	Elliott, Thomason & Gibson, LLP, c/o Vickie L. Driver, Suite 202, Dallas, TX 75201, UNITED STATES
aty	+ Jonathan Day, Paul, Weiss, Rifkind, Wharton & Garrison, 1285 Avenue of the Americas, New York, NY 10019-6031
aty	+ Jones Murray LLP, 602 Sawyer Suite 400, Houston, Tx 77007-7510
aty	+ Leslie E. Liberman, Paul, Weiss, Rifkind, Wharton & Garrison, 1285 Avenue of the Americas, New York, NY 10019-6031
aty	+ Martin, Disiere, Jefferson & Wisdom, LLP, 808 Travis, Suite 1100, Houston, TX 77002-5831
aty	+ Paul Andrew Paterson, Paul, Weiss, Rifkind, Wharton & Garrison, 1285 Avenue of the Americas, New York, NY 10019-6031
aty	+ Reynal Law Firm, P.C., 917 Franklin St., Suite 600, Houston, TX 77002-1764
aty	+ Richard A. Cochrane, Caldwell Cassady Curry PC, 2121 N. Pearl St., Ste. 1200, Dallas, TX 75201-2494
aty	+ Theodore James Salwen, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036-6730
aty	+ Vida J Robinson, Paul, Weiss, Rifkind, Wharton & Garrison, 1285 Avenue of the Americas, New York, NY 10019-6031
fa	+ BlackBriar Advisors LLC, 3131 McKinney Ave., Suite 600, Dallas, TX 75204-2456
cr	+ Elevated Solutions Group, LLC, c/o Walker & Patterson, P.C., P.O. Box 61301, Houston, TX 77208-1301
cr	+ Free Speech Systems, LLC, Free Speech Systems, LLC, c/o Patrick Magill, 3019 Alvin Devane Blvd., Ste 300 Austin,, TX 78741-7417
cr	+ Reeves Law, PLLC, 702 Rio Grande St., Suite 203, Austin, TX 78701-2720
cr	+ Security Bank of Texas, P.O. Box 90, Crawford, Tx 76638-0090

TOTAL: 19

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	WIEDIN	Nov 27 2024 19:43:31	Ally Bank, c/o Quilling, Selander, et al, 2001 Bryan Street, Suite 1800, Dallas, TX 75201-3070
cr	+ Email/PDF: acg.acg.ebn@aisinfo.com	Nov 27 2024 19:48:06	Ally Bank, c/o AIS Portfolio Services, LLC, 4515 N Santa Fe Ave. Dept. APS, Oklahoma City, OK 73118-7901
cr	Email/PDF: bncnotices@becket-lee.com	Nov 27 2024 20:00:50	American Express National Bank, c/o Becket and Lee LLP, PO Box 3001, Malvern, PA 19355-0701
cr	Email/Text: creditcardbkcorrespondence@bofa.com	Nov 27 2024 19:43:00	Bank of America N.A., P.O. BOX 31785, Tampa, FL 33631-3785
cr	+ Email/Text: notifications@cstrial.com	Nov 27 2024 19:44:00	Erica L. Ash, c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701, UNITED STATES 78701-0137
cr	+ Email/Text: notifications@cstrial.com	Nov 27 2024 19:44:00	Francine Wheeler, Cain & Skarnulis PLLC, Ryan E. Chapple, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137

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1748, Austin, TX 78767-1748

User: ADIuser

Date Rcvd: Nov 27, 2024 Form ID: pdf002 Total Noticed: 30 crcm + Email/Text: mbrimmage@akingump.com Nov 27 2024 19:44:00 Official Committee Of Unsecured Creditors, c/o Marty L. Brimmage, Jr., Akin Gump Strauss Hauer & Feld LLP, 2300 N. Field Street, Suite 1800, Dallas, TX 75201-4675 + Email/Text: lemaster@slollp.com cr Nov 27 2024 19:44:00 PQPR Holdings Limited, LLC, c/o Streusand Landon Ozburn & Lemmon LLP, attn: Stephen Lemmon, 1801 S. Mopac Expressway, Suite 320, Austin, TX 78746-9817 + Email/Text: notifications@cstrial.com cr Nov 27 2024 19:44:00 Richard M. Coan, c/o Cain & Skarnulis PLLC, 303 Colorado Street, Suite 2850, Austin, TX 78701-0137 ^ MEBN cr Texas Comptroller of Public Accounts, Revenue Nov 27 2024 19:43:17 Acco, Kimberly A. Walsh, PO Box 12548, Austin, TX 78711-2548 + Email/Text: BKECF@traviscountytx.gov cr Nov 27 2024 19:44:00 Travis County, c/o Jason A. Starks, P.O. Box

TOTAL: 11

District/off: 0541-4

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID aty	Bypass Reason	Name and Address Akin Gump Strauss Hauer & Feld LLP
cr		Carlee Soto Parisi
cr		Carlos M Soto
intp		David Ross Jones
cr		David Wheeler
cr		Discover Fund Management, Inc.
cr		Donna Soto
intp		First United American Companies, LLC
intp		Global Tetrahedron, LLC
cr		Ian Hockley
cr		Jacqueline Barden
cr		Jennifer Hensel
cr		Jillian Soto-Marino
cr		Mark Barden
cr		Nicole Hockley
cr		Public Storage
op		Rachel Kennerly LLC
cr		Robert Parker
cr		William Aldenberg
cr		William Sherlach
intp		X Corp.
cr	##+	Leonard Pozner, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774
cr	##+	Marcel Fontaine, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin, Suite 2700, Houston, TX 77002-6774
cr	##+	Neil Heslin, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774
cr	##+	Scarlett Lewis, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774
cr	##+	Veronique De La Rosa, c/o McDowell Hetherington LLP, Attention: Avi Moshenberg, 1001 Fannin Street, Suite 2700, Houston, TX 77002-6774

TOTAL: 21 Undeliverable, 0 Duplicate, 5 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and

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belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 29, 2024	Signature:	/s/Gustava Winters	

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 27, 2024 at the address(es) listed below:

below:	
Name	Email Address
Annie E Catmull	on behalf of Creditor Free Speech Systems LLC aecatmull@o-w-law.com, aecatmull@ecf.courtdrive.com,llumtacae@gmail.com
Avi Moshenberg	on behalf of Creditor Marcel Fontaine avi.moshenberg@lmbusinesslaw.com avi.moshenberg@lmbusinesslaw.com
Avi Moshenberg	on behalf of Plaintiff Veronique De La Rosa avi.moshenberg@lmbusinesslaw.com avi.moshenberg@lmbusinesslaw.com
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Christina Walton Stephenson	on behalf of Attorney Crowe & Dunlevy crissie@etglaw.com elisa@etglaw.com
Christina Walton Stephenson	on behalf of Defendant Alexander E. Jones crissie@etglaw.com elisa@etglaw.com
Christopher R Murray	

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Gregg Jeffrey Costa

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Marty L Brimmage

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Date Rcvd: Nov 27, 2024 Form ID: pdf002 Total Noticed: 30

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TOTAL: 149